

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOE MEYERS, Individually and On Behalf of All Others Similarly Situated,	§ § § § §
Plaintiff,	§ CIVIL ACTION NO. 4:09-cv-02256
v.	§ § § § §
PIONEER EXPLORATION, LLC,	§ § § §
Defendant.	§

**UNOPPOSED MOTION TO WITHDRAW  
AND FOR SUBSTITUTION OF COUNSEL**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Defendant Pioneer Exploration, LLC (“Pioneer”) and requests that this Court allow Howard L. Close, Harvey G. Brown, Jr., and Kathleen S. Rose, of the Wright Brown & Close LLP firm in Houston, Texas to withdraw as its counsel in this case and permit the substitution of W. Clark Lea, State Bar No. 12069690, S.D. Federal ID 16592, with the law firm of Cotton, Bledsoe, Tighe & Dawson, P.C., 500 W. Illinois, Suite 300, Midland, Texas 79701, to proceed as counsel for Pioneer. The substitution of counsel is not sought for delay, nor will it cause any disruption in the progress of this case. All parties and counsel approve of this substitution of counsel.

WHEREFORE, PREMISES CONSIDERED, Defendant Pioneer Exploration, LLC prays that this Court permit the withdrawal of Howard L. Close, Harvey G. Brown, Jr., and Kathleen S. Rose as its counsel, and permit the substitution of W. Clark Lea as its attorney of record.

Respectfully Submitted,

/s/ Howard L. Close

Howard L. Close  
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**ATTORNEYS FOR DEFENDANT PIONEER  
EXPLORATION LLC**

**AGREED AND ACCEPT  
REPRESENTATION OF  
PIONEER EXPLORATION LLC.:**

/s/W. Clark Lea

W. Clark Lea

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**CERTIFICATE OF CONFERENCE**

I hereby certify that an attorney for each party in this case was contacted and they did not oppose the relief sought in this Motion.

/s/W. Clark Lea

W. Clark Lea

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 16th day of November 2009, I electronically filed the foregoing with the Clerk of court using the CM/ECF system which will send notification of such filing to the following attorneys of record:

Mr. Jeremi K Young  
The Young Law Firm  
112 W. 8th Avenue, Suite 900-D  
Amarillo, Texas 79101

/s/Howard L. Close

Howard L. Close